

LDW5F
4.8.1
8-21-14

Sanga, Ravi

From: Dyer, Miles <mdyer@JorgensenForge.com>
Sent: Thursday, August 21, 2014 10:22 AM
To: Sanga, Ravi
Cc: Ernst, William D; Amy Essig Desai; JC Clark; Dee Gardner; Tom Colligan; 'Paul Grant'
Subject: SSP In-Water Removal Process
Attachments: removed.txt; RE: EPA Ltr 8-15-14 Response; JFC-Boeing 2nd Mod Site Fig - Sheetpile laydown area Aug 2014.pdf

Ravi

This email will serve as a response to EPA's letter dated 15 August 2014.

The attachment is EPA's approval to proceed with removal of the three in-water SSP walls by PP&M. The date and time for removing the in-water SSP will be determined by EMJ's and PP&M's schedule. I have spoken with Amy Essig Desai. We have agreed that a projected schedule of activity for removing the SSP will be provided to JFC in order to continue coordination with PP&M and EMJ's representatives.

The following email pertains to the detailed sequence of operations for removing, decontaminating and storage of the in-water SSP. The SSP will be stored behind the existing upland SSP wall identified as the 3rd Modification to the Jorgensen Forge Outfalls Site area. For your reference, the attached drawing outlines this future 3rd modification area.

All parties are in agreement with the sequence and methods of operations.

Thank you

Miles Dyer
Director, Environmental, Health and Safety Programs
Maintenance Director



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From: JC Clark [mailto:jc@pacificpile.com]
Sent: Thursday, August 21, 2014 9:35 AM
To: Dyer, Miles
Cc: Paul Grant; Ernst, William D; Tom Colligan; Marty Locke
Subject: Re: Draft email for evaluation pertaining to SSP Removal

Miles,

The sequence of work looks good to PPM. No changes or modifications from us.



Thanks,

On Thu, Aug 21, 2014 at 7:53 AM, Dyer, Miles <mdyer@jorgensenforge.com> wrote:

Please review and comment before official release:

JC

Attached for your records is the approval from EPA to proceed with removal of three in-water SSP walls which make up the coffer dam. As discussed this morning with EMJ representatives, the concept is to use an equipment barge and crane to extract the walls from the LDW and lay them into the equipment barge. PP&M will provide a decontamination team to remove the black area from the SSP as defined in 40 CFR Chapter 1, Subpart R, Part 761, Subpart D, Section 761.79, Decontamination Standards and Procedures for PCBs. Here is an extraction for your use: (<http://www.law.cornell.edu/cfr/text/40/761.79>)

Mud sticking to the sheetpile needs to be brushed or scraped off as well.

Operational Steps:

1. Position equipment barge and crane per PP&M's requirements to extract the SSP.
2. Crane extracts a single piece of SSP and positions on the equipment barge, where the SSP is unhooked per PP&M's requirements.
3. The SSP will be placed on the barge so that the blackened area on the SSP is facing up.
 - a. PP&M employees will remove the black area located on the SSP using a solvent as identified within the TSCA requirements for non-porous surfaces (Kerosene, diesel, terpene hydrocarbons or mixtures of terpene hydrocarbons and terpene alcohols). The solvent must be 5% or more by weight.
4. Methods of removal can include wiping with rags soaked with an appropriate solvent or scraping (corners and creases of SSP walls).
 - a. Safety BMPs must be in place to avoid skin contact with the cleaning solvent and to ensure no fumes harm employees and no ignition of fumes.
 - b. If scraping methods are used, no scraping materials can be transferred to the barge deck. Scraping residue must be cleaned off of the surface with a solvent coated rag.
 - c. A barrel with water to dispose of contaminated rags to prevent auto-ignition.

- d. All cleaning materials, hand tools, and personal protective equipment will be appropriately disposed of.
 - e. Fire extinguishers must be readily available.
5. Upon PP&M declaration that the SSP has been cleaned, an SES employee will be summoned from the Barge Control Area to perform a sample in accordance with the TSCA standard.
 - a. Per EPA's request in the attached letter, 3 samples are to be taken according to TSCA protocols - one sample from a sheet taken from each wall.
 - b. The SSP will be marked by SES in a manner to identify the SSP used for the sample.
 - c. The SES employee will verify the cleaning has been completed on all Sheet Steel Panels.
6. Once the SSP has been verified by SES as "clean", the crane will lift the SSP panel from the equipment barge.
7. The crane will transfer the SSP from the barge to the identified area prepared on the upland side behind the land based SSP wall.
8. A distance of 8 feet from the SSP land based wall to the edge of the laid down SSP must be maintained to ensure no hydraulic land pressures are applied to the SSP wall and provide personnel access along the top of bank.
9. This process will be repeated as needed. The barge when emptied will be decontaminated per PP&M requirements before returning to use.
10. The SSP stack should not be greater than 12 panels high.
11. The stacks must be placed as far north along the JFC/Boeing property line as possible. When positioning the barge to remove the north SSP wall, riff-raff located exterior of the wall on the northern side must be removed prior to extracting the SSP.
 - a. The riff-raff will be appropriately placed in a location determined by Boeing.
 - b. There can be no damage to the two testing wells located in this area where PP&M's equipment will be located to remove the riff-raff.
 - i. CAUTION: When positioning PP&Ms equipment to remove the riff-raff, the equipment cannot be closer than 8 feet to the SSP wall located on the upland bank. The work area can be modified as necessary to position the equipment the required setback from the top-of-bank SSP wall.
12. Samples will be submitted to ARI labs for analysis.
13. Once all of the SSP has been transferred to land, the stacks will be covered in 20-mil plastic or suitable tarps with appropriate weights to hold the plastic in place.

Director, Environmental, Health and Safety Programs

Maintenance Director



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----- Forwarded message -----

From: "Blocker, Shawn" <Blocker.Shawn@epa.gov>

To: "Dyer, Miles" <mdyer@JorgensenForge.com>, Ravi Sanga (b) (6)

Cc: "Ernst, William D" <william.d.ernst@boeing.com>, Amy Essig Desai <aedesai@farallonconsulting.com>, Ryan Barth <rbarth@anchorqea.com>, Tom Colligan <Tom.Colligan@floydsnider.com>, Chu Rebecca <Chu.Rebecca@epa.gov>

Date: Wed, 20 Aug 2014 12:49:12 -0700

Subject: RE: EPA Ltr 8-15-14 Response

Approved.

Shawn Blocker

Unit Manager

Site Cleanup Unit 3

Remedial Cleanup Program

U.S. EPA Region 10

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Cell: (206) 321-0466

From: Dyer, Miles [mailto:mdyer@JorgensenForge.com]

Sent: Monday, August 18, 2014 10:29 AM

To: Blocker, Shawn; Ravi Sanga

Cc: Ernst, William D; Amy Essig Desai; Ryan Barth; Tom Colligan; Chu Rebecca

Subject: EPA Ltr 8-15-14 Response

Shawn, we've included Amy and Brian in this reply to make for quicker coordination given schedule pressures.

This is in reply to EPA's Cofferdam sheetpile staging concerns from Ravi's August 15 letter, which says:

Uplands of the site will be clean (i.e. decontaminated, bank work will be complete)

- Cross Contamination from PCB contaminated sediment residues from the SSP with the clean bank and shoreline sediments.

Response - JFC and Boeing's approach to safely removing, decontaminating and storing the sheets:

- The cofferdam in-water segments would be removed by a PP&M crane barge and placed on an equipment barge.
- Each segment would be decontaminated on the equipment barge and randomly sampled with quick-turn analytical results.
- When the sheets are determined to be clean, the crane barge at high tide will offload the sheets to the upland area behind the remaining top-of-bank sheetpile wall. (See modified JFOS Order figure)

- JFC heavy forklift will guide stacking of sheets. Sheets will be stored until 2015, when the 3rd Modification to the Jorgensen Forge Outfalls Site work is completed in that same area.

EMJ concerns addressed:

- JFC/Boeing approach completes 2nd Mod the JFOS Order in an expeditious manner, allowing the shared contractor, PPM, to timely satisfy both clients.
- EMJ's planned uplands area of work is south of the cement dividing wall and east of the future 3rd JFOS Order mod footprint. The SSP would be placed north of the dividing wall between the wall and Boeing's existing sheetpile wall (see figure).
- Cross contamination from the SSP will not occur – sheets are removed directly to barge for decontamination and sampling, and will be clean when transferred to land outside of the EMJ project area.

The area referred to as the upland site being cleaned by EMJ has yet to be rebuilt as described in the RAWP Appendix J.

The proposed SSP storage area is shown in the attached figure. Ravi's area of responsibility will be remediated during CY-2015. Stockpiling decontaminated SSP in this area would not create any interference with EMJ's project.

There would still be sufficient room for equipment to maneuver for EMJ's project around the north end of the JFC black shack.

PP&M would perform separate decontamination procedures, including capture of any waters and proper disposal on the equipment barge.

It is our understanding that PP&M is required to dig outside the three (3) in water SPP walls prior to removal of the SSP walls. Once the SSP walls are removed, then the DMUs would be backfilled to final elevation.

The SSP would be stored in an area where EMJ's final site cleanup/decontamination (including surface excavation) will not create any issues for EMJ, while allowing effective and expedition completion of 2nd Mod work by JFC and Boeing.

If you like the above approach, it needs to be included in a plan and approved by EPA this week so we all meet the shared EMJ/JFC/Boeing timeline. We look forward to resolving this matter with you at your earliest convenience. Thanks.

Miles Dyer

Director, Environmental, Health and Safety Programs

Maintenance Director

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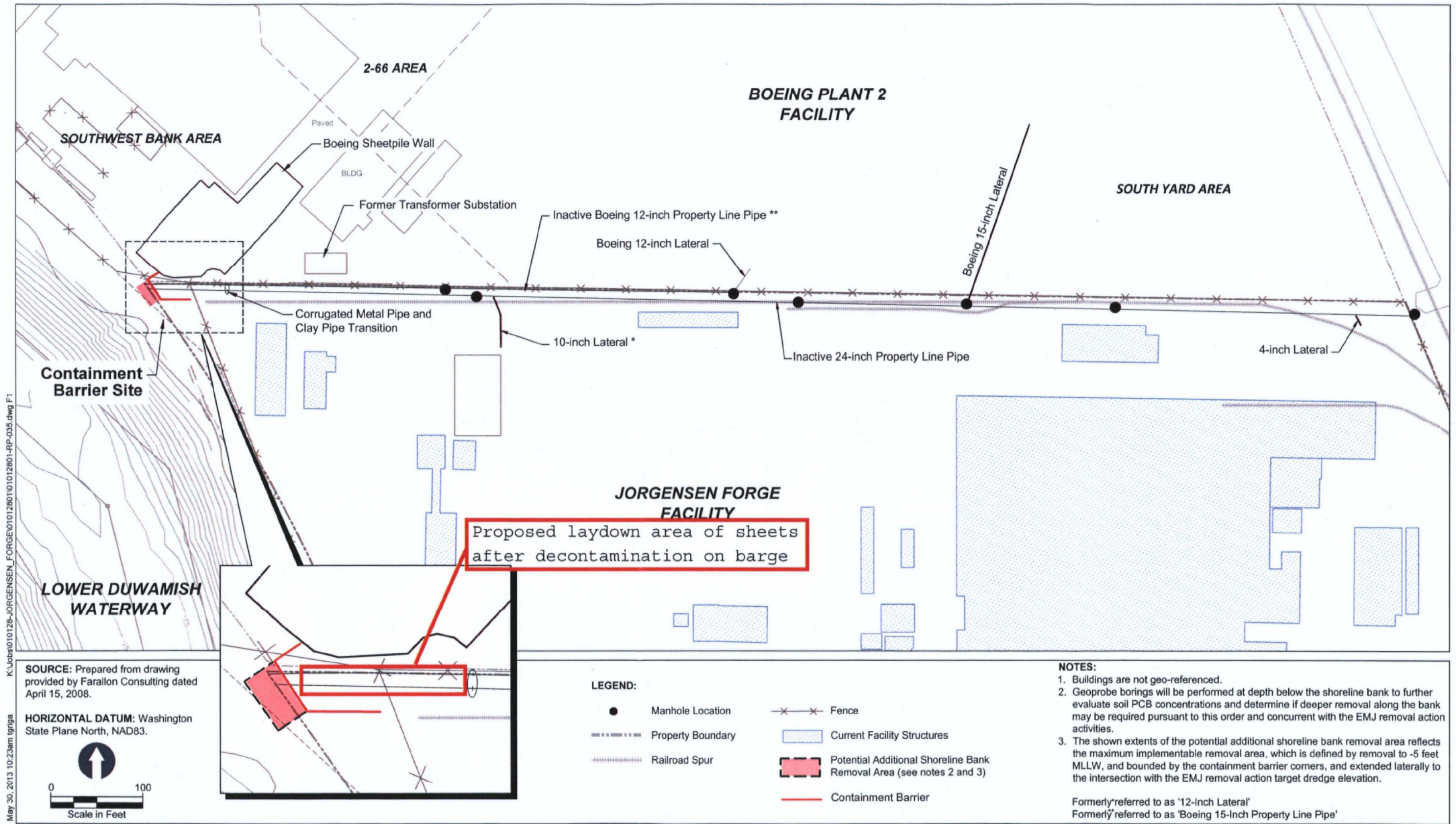
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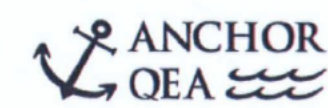


Figure 1
Containment Barrier Site Area
Second Modification to Administrative Order on Consent
Jorgensen Forge Outfall Site